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Attorneys for Defendant COMMUNITY HOSPITAL OF
THE MONTEREY PENINSULA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

RAYNALD ADAMS, SARAH
ANDREWS, ANDREW BASHAW,
LAUREN BRUCE, ANDREA CHAN,
JAMES CHARLES III, HEATHER COX,
ROSELLE EMPLEO-MENDOZA,
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ROYO, ELISABETH SIMS, LOURDES
SINCLAIR, MARIAH SMITH, SYDNEY
SMITH, AMANDA STRAUTHERS,
ALVARO VASQUEZ, MATTHEW
WALBECK, LAVERNE WOODROW,
SARAH WURTZ-HUSEBY, YASUKO
YAMAMOTO,

Plaintiffs,

v.

COMMUNITY HOSPITAL OF THE
MONTEREY PENINSULA, and DOES 1
through 50, inclusive,

Defendants.

Case No.: 5:22-cv-00420-VKD

**JOINT STIPULATION TO EXTEND
DEADLINE TO PRODUCE DOCUMENTS
AND INFORMATION PURSUANT TO
GENERAL ORDER NO. 71; ~~PROPOSED~~
ORDER**

Complaint Filed: November 29, 2021
Date of Removal: January 21, 2022
Trial Date: None Set

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TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

IT IS HEREBY STIPULATED by and between Plaintiffs RAYNALD ADAMS, et al. and Defendant COMMUNITY HOSPITAL OF THE MONTEREY PENINSULA, by and through their attorneys of record, that the current deadline of February 19, 2022 for the parties to produce documents and information pursuant to General Order No. 71 be extended by sixty (60) days to April 20, 2022.

This stipulation is made on the grounds that there is good cause for this case to be exempted from General Order No. 71's 30-day deadline for initial disclosures because there are thirty-five plaintiffs in this action, and, given the number of plaintiffs and the number of documents that relate to these plaintiffs, additional time is needed to produce documents and information in compliance with General Order No. 71. Additionally, the proposed amended schedule will not prejudice any party to this action.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: February 15, 2022

FENTON & KELLER

By: /s/ Christopher E. Panetta

Christopher E. Panetta
Elizabeth R. Leitzinger
Attorneys for Defendant
COMMUNITY HOSPITAL OF THE
MONTEREY PENINSULA

Dated: February 15, 2022

WATKINS & LETOFSKY, LLP

By: /s/ Daniel Watkins

Daniel R. Watkins
Attorneys for Plaintiffs
RAYNALD ADAMS, et al.

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ORDER

THERE BEING GOOD CAUSE, IT IS HEREBY ORDERED that Plaintiffs' and Defendant's deadline to produce documents and information under General Order No. 71 is hereby extended to April 20, 2022.

IT IS SO ORDERED.

DATED: February 16, 2022


United States District Court Judge